



3rd Qtr Progress REport

Nickel, Jon

to:

Linda Jacobson

11/04/2009 11:40 AM

Cc:

"Johnson, Iver".

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1 Attachment



Solid and Hazardous Waste - Quarterly Progress Report (July - Sept 2009).doc

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Administrator
Enforcement Division
Department of Environmental Quality
1520 E. Sixth Avenue
P. O. Box 200901
Helena, Montana 59620-0901

October 12, 2009

**DOCKET No.: HW-07-01
EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

Dear Administrator:

On October 2, 2007, Asarco and the Montana Department of Environmental Quality (Department) entered into an Administrative Order on Consent, Docket No. HW-07-01 (Order), to continue Asarco's cleaning and demolition program established under the 2005 Consent Decree. The Order requires Asarco to develop and implement yearly work plans for the removal, storage, and proper disposal or recycling of all remaining hazardous waste and/or secondary material located in process units, pollution control devices, and storage units and other identified areas of the East Helena Plant.

On March 13, 2009, Asarco submitted the proposed 2009 Cleaning and Demolition Program and 2009 Interim Measures Work Plan Addendum (Work Plan) to the Department, EPA, and Montana Historic Society. The Work Plan fully described the activities scheduled to be implemented during calendar year 2009 at the East Helena Plant to address obligations under the Order and certain requirements under the RCRA Consent Decree (Decree).

In two April 21, 2009 letters, EPA and the Department conditionally approved the April 2009 Work Plan providing that Asarco 1) increase the collection of duplicate samples in exposed soils sampling areas and 2) conduct additional soils sampling at five locations identified on the modified Sheet 10 in EPA's approval letter. On April 22, 2009, Asarco submitted the revised and final Work Plan to EPA and the Department.

On May 5, 2009, Asarco conducted a mandatory pre-bid walk through for the 2009 Cleaning and Demolition Work. On May 19, 2009, Asarco received bids from nine contractors for completing the 2009 Cleaning and Demolition Program and 2009 Interim

Measures Work Plan Addendum Project. On May 29, 2009, Asarco provided EPA with the results of the contractor evaluation and a recommendation for selecting URS/CWC. On June 1, 2009, Asarco provide EPA with a summary cost table from the nine bidding contractors. On June 1, 2009, EPA, in consultation with the Department advised Asarco to proceed with notifying URS/CWC of the selection, including the proposal to Express Services to complete the tasks outlined in Additive Alternate A.

Section 5.1 of the Work Plan requires Asarco to submit quarterly Work Plan Reports to the Department that discuss the actions taken by Asarco under the Work Plan. The following report describes those activities that have occurred or are related to projects performed under the approved Work Plan from July 2009 through September 2009.

a. A description of the portion of the Work Plan completed;

BUILDINGS AND STRUCTURES SCHEDULED FOR CLEANING

Hydrogen Peroxide Storage Tanks

The cleaning of the hydrogen peroxide storage tanks is complete. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

High Grade Building

The cleaning of the high grade building commenced during the third quarter 2009. The remaining cleaning of the high grade building is scheduled for the fourth quarter 2009.

Truck Scale

The cleaning of the truck scale is scheduled for the fourth quarter 2009.

Locomotive Crane Shed

The cleaning of the locomotive crane shed is complete. On September 22, 2009, Asarco submitted the completion notification letter to the Department.

Cement and Dust Silos

The cleaning of the cement and dust silos is complete. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Soda Ash and Lime Silo and Coke Hopper

The cleaning of the soda ash and lime silo and coke hopper is scheduled for the fourth quarter 2009.

Pump House

The cleaning of the pump house commenced during the third quarter 2009. The remaining cleaning of the pump house is scheduled for the fourth quarter 2009.

Storm Water Sump

The cleaning of the storm water sump is scheduled for the fourth quarter 2009.

Direct Smelt Building

The cleaning of the direct smelt building was completed during the third quarter 2009. On August 28, 2009, Asarco submitted the completion notification letter to the Department.

Coverall Buildings

The cleaning of the coverall buildings commenced in the second quarter 2009. The remaining cleaning of the coverall buildings is scheduled for the fourth quarter 2009.

Adobe Shed

The cleaning of the adobe shed was completed during the third quarter 2009. On September 15, 2009, Asarco submitted the completion notification letter to the Department.

Utility Support Towers

The cleaning of the utility support towers is scheduled for the fourth quarter 2009.

Concentrate Storage and Handling Building

The cleaning of the concentrate storage and handling building commenced in the third quarter 2009. The remaining cleaning of the concentrate storage and handling building is scheduled for the fourth quarter 2009.

BUILDINGS AND STRUCTURES SCHEDULED FOR CLEANING PRIOR TO DEMOLITION

Sample Mill and Dust Loadout Baghouses

The cleaning of the sample mill and dust loadout baghouses was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Crushing Mill Baghouses

The cleaning of the crushing mill baghouses was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Stocking Building Baghouse

The cleaning of the sinter stocking building baghouse was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Concentrate Storage and Handling Building Baghouses, Ventilation Ductwork, and Stack Base

The cleaning of the concentrate storage and handling building baghouses, ventilation ductwork and stack base was completed during the third quarter 2009.

On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Hopto Pad, Storage Bins, and Conveyor Gallery

The cleaning of the hopto pad, storage bins, and conveyor gallery was completed during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Acid Dust Facility

The cleaning of the acid dust facility was completed during the third quarter 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Groundwater Sump

The cleaning of the groundwater sump was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

BUILDINGS AND STRUCTURES SCHEDULED FOR DEMOLITION

Sample Mill

The demolition of the sample mill was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Crushing Mill

The demolition of the crushing mill was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Hopto Pad, Storage Bins, and Conveyor Gallery

The demolition of the hopto pad, storage bins, and conveyor gallery was completed during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Acid Dust Facility

The demolition of the acid dust facility was completed during the third quarter 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Stocking Building

The demolition of the sinter stocking building baghouse was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Abandoned and New Breaking Floor Buildings

The demolition of the abandoned and new breaking floor buildings was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Groundwater Sump

The demolition of the groundwater sump was completed during the third quarter 2009. Asarco will submit a notification letter to the Department during the fourth quarter 2009.

Concentrate Storage and Handling Building Ventilation System and Stack

The demolition of the concentrate storage and handling building ventilation system and stack was completed during the third quarter 2009. On September 30, 2009, Asarco submitted the completion notification letter to the Department.

Sinter Plant, Acid Plant, and Blast Furnace Stacks

The demolition of the sinter plant, acid plant, and blast furnace stack took place on August 14, 2009. On September 25, 2009, Asarco submitted the completion notification letter to the Department.

Miscellaneous Railroad Ties

The miscellaneous railroad ties were hauled to the CAMU Phase 2 cell during the third quarter 2009. On September 28, 2009, Asarco submitted the completion notification letter to the Department.

Asarco provided the State Historic Preservation Office with a script for the demolition video.

All prescribed exposed surface soil areas within the demolition footprint have been sampled.

With the exception of one plant water line near the sample mill, all of the prescribed abandoned underground utilities have been flow filled.

With the exception of certain areas within the crushing mill area, most prescribed demolition footprint have been backfilled with fumed slag. These backfilled areas have been or will soon be rolled to achieve proper drainage prior to the placement of the interim caps.

b. Summaries of all deviations from the approved Work Plan during the reporting period;

Asarco proposed cleaning and placing a temporary liner in the former coke storage area to minimize storm water infiltration. The cleaning of the area and placement of the liner was not a component of the approved 2009 Work Plan and will result in increased costs. EPA approved Asarco's proposal and granted credit for this work under the custodial trust. There were no other deviations from the approved Work Plan during the reporting period.

c. Summaries of all problems or potential problems encountered during the reporting period;

During the cleaning of the concentrate storage and handling building, Asarco determined that the cleaning of the feeder grates in their present location posed a safety hazard. In consultation with Asarco, EPA, Hydrometrics, and the Department, approval to remove the feeder grates using an overhead crane was granted. The cleaning of the feeder grates minimized the safety hazard and accelerated the cleaning process.

The height of the large concentrate storage and handling building (CSHB) bin walls has presented challenges to completing the required cleaning. The removal of CSHB center bin walls and breaching of bin wall bases took place to gain the necessary access.

Many of the tasks originally assigned to Express Service personnel have been transferred to URS/CWC personnel. The transfer was necessary to address long-term operation of the on-site water treatment facility.

d. Projected work for the next reporting period;

The remaining, unfinished tasks set forth in the Work Plan will be completed during the fourth quarter 2009. Weekly progress meeting will continue to take place every Wednesday to review the progress of the project. URS/CWC and their subcontractors will continue with the cleaning and demolition set forth in the Work Plan. ARCADIS will continue with the recordation program.

e. Documentation of all shipments of recyclable materials and hazardous wastes off-site including shipping papers such as manifests (if required);

Scrap Metal

There were 155 shipments of recyclable materials (unprepared scrap steel) that were shipped during the third quarter 2009. A copy of the scrap metal daily summary report for these shipments is attached to this quarterly progress report.

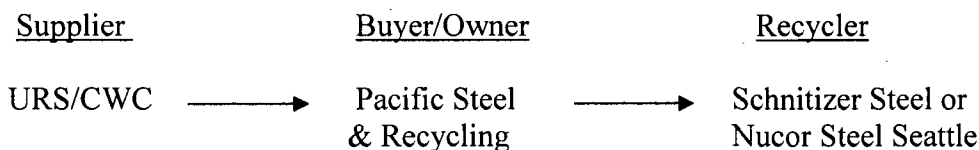
There were no off-site shipments of hazardous wastes associated with the 2009 Work Plans during the third quarter 2009. The waste material generated during the cleaning and demolition project was hauled directly to the CAMU Phase 2 cell. The following materials were hauled to the CAMU Phase 2 cell during the third quarter 2009.

Description of Material	Amount (Tons)
200 Foot Acid Tail Gas Stack	1912
400 Foot Sinter Stack	7205
425 Foot Blast Furnace Baghouse Stack	3652
Breaking Floor/Highline Area	1066
Crushing Mill Area	2813
Direct Smelt Building Cleaning Debris	827
Hopto Pad Area	3479
CSHB Cleaning Material	907
CHSB Wall Demolition Material	695
Sample Mill Area	5262
Railroad Ties Material	163
Acid Dust Facility	14
Total	27,996

- f. **Description of each shipment of reclaimed or recycled material made during the preceding quarter indicating how the material is managed, handled, or treated for recovery or recycling that demonstrates that it has value. The information to be submitted to the Department in making a successful stewardship demonstration is (1) acceptance criteria required by the receiving facility (expressed as a minimum threshold of recoverable metals and maximum allowable toxic metals), (2) a demonstration that the receiving facility is in compliance with all applicable environmental requirements, (3) a copy of the contractual agreement between Asarco, its broker and the receiving facility, (4) the name of the state or provincial regulatory contact and facility contact.**

Scrap Steel

The recoverable scrap steel that has been generated as part of the 2008 Work Plans was managed in accordance with the following procedures.



1. URS/CWC acquired ownership of all recoverable scrap metal that was generated under the 2009 Work Plan. URS/CWC contracted with Pacific Steel & Recycling to haul and recycle the scrap steel. URS/CWC loaded the unprepared scrap steel (defined as material that is cut into lengths that will fit into roll-off containers and side dump trucks) into roll-off containers and side dump trucks for transport to the Pacific Steel & Recycling facility located in Helena, Montana. Pacific Steel & Recycling will export prepared steel (defined as material that is cut into lengths specified by the receiving mill) to

the two scrap metal recycling facilities described above. The processed scarp steel will be re-used in other steel products.

2. A September 26, 2007 letter from Mike Kempel (Pacific Steel and Recycling) states that the two mills listed above comply with all federal requirements for processing scrap metal. A copy of the September 26, 2007 letter is attached to this quarterly progress report.
3. A copy of the contract pricing letter between Pacific Steel and Recycling and URS/CWC is attached to this quarterly progress report.
4. The name of the state or provincial regulatory contact and facility contact for the scrap steel are:

(For Pacific Steel & Recycling)

Rick Thompson
Montana Department of Environmental Quality
Section Supervisor
Solid Waste and Recycling
Helena, Montana 59620
(406) 444-5345

(For Schnitizer Steel)

Jane Hickman
Oregon Department of Environmental Quality
Manager
Solid Waste and Recycling
Portland, Oregon 97203
(503) 710-5555

(For Nucor Steel Seattle, Inc.)

Elliot Zimmermann
Washington Department of Ecology
3190 160th Avenue, SE
Bellevue, Washington 98008-5452
(425) 649-7072

(For Pacific Steel & Recycling)

Eric Meredith
Branch Manager
Pacific Steel and Recycling
1530 National Avenue
P. O. Box 4226
Helena, Montana 59604-4226
Telephone (406) 442-7851

(For Schnitizer Steel)

Bill Whiten
Schnitzer Steel
Manager
12005 North Burgard Road
Portland, Oregon 97203
(503) 710-1559

(For Nucor Steel Seattle, Inc.)
Bart Kale
Environmental Manager
Nucor Steel Seattle, Inc.
2424 SW Andover Street
Seattle, Washington 98106-1100
(604) 324-4656

If you should need any further explanation or assistance with the information contained in this quarterly progress report, please feel free to contact me.

Sincerely,

Jon Nickel

Attachment

cc: Iver Johnson
Linda Jacobson

Bcc: Tom Aldrich
Scott Janoe
Mark Rhodes

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

SCRAP METAL DAILY SUMMARY REPORT

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

SEPTEMBER 26, 2007 PACIFIC STEEL AND RECYCLING LETTER

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
JULY 2009 - SEPTEMBER 2009**

CONTRACT PRICING LETTER